

3017 '99 AUG -4 A9 49

July 28, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane, Room 1061  
Rockville, MD 20852

Dear FDA,

This is in reference to DOCKET NOS: 98N-1230; 96P-0418; 97P-O197 regarding Forced Molting of Egg-laying hens.

Each year the US egg industry force molts, intentionally starves for up to 14 days, millions of hens to increase egg production. Forced molting is extremely stressful and cruel to the hens. It has been scientifically shown that it destroys the hens' immune systems, predisposing the birds and their eggs to Salmonella poison. The US Dept of Agriculture's Food Safety & Inspection Service (FSIS) stated: "FSIS recognizes that public health concerns are raised by highly stressful forced molting practices. For example, extended starvation and water deprivation practices lead to increased shedding of Salmonella enteritidis by laying hens subjected to these practices." In other words this practice can cause infectious diseases in hens, eggs, and to those who eat the eggs.

Because of the many illnesses and deaths caused by contaminated eggs, FDA must do more than put bacteria warning labels on egg cartons and regulate egg refrigeration temperatures. I feel FDA should ban the practice of "forced molting" on egg-laying hens. You have the jurisdiction to ban farm practices, such as forced molting, that can potentially injure human health. As a registered dietitian I have an enormous interest in this issue.

It is my understanding that FDA was petitioned in April 1998 to ban forced molting. This petition should be granted without further delay.

Sincerely,



Myriam Parham, RD, LD, CDE



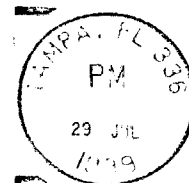
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96P0418


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CROSS FILE SHEET

File Number: 98N-1230/ C42

See File Number: 97P-0197/ C43  
96P 0418/ C42